

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JULIO & SONS COMPANY,

Plaintiff,

-against-

TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA,

Defendant.

No. 2008 CIV. 03001 (RJH)

**MOTION TO ADMIT JOSEPH  
M. COX PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Philip M. Smith, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Joseph M. Cox  
Patton Boggs LLP  
2001 Ross Avenue,  
Suite 3000  
Dallas, Texas 75201  
Telephone: (214) 758-1500  
Facsimile: (214) 758-1550

FILED  
U.S. DISTRICT COURT  
2008 APR 16 PM 1:25  
S.D. OF N.Y.

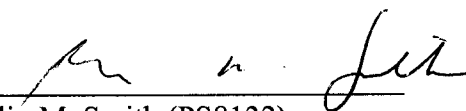
Mr. Cox is a member in good standing of the State Bar of Texas.

There are no pending disciplinary proceedings against Mr. Cox in any State or Federal court.

Dated: April 15, 2008

New York, New York

Respectfully submitted,

By: 

Philip M. Smith (PS8132)  
PATTON BOGGS LLP  
1185 Avenue of the Americas  
30<sup>th</sup> Floor  
New York, New York 10036  
Telephone: (646) 557-5100  
Facsimile: (646) 557-5101

Attorneys for Plaintiff Julio & Sons Company

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JULIO & SONS COMPANY,

Plaintiff,

No. 2008 CIV. 03001 (RJH)

*-against-*

TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA,

**DECLARATION OF PHILIP M.  
SMITH IN SUPPORT OF  
MOTION TO ADMIT JOSEPH M.  
COX PRO HAC VICE**

**Defendant.**

**I, Philip M. Smith, declare as follows:**

1. I am a member of the law firm of Patton Boggs LLP, and counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Joseph M. Cox as counsel pro hac vice to represent the Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February of 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Joseph M. Cox since January 10, 2008.

4. Joseph M. Cox is an attorney employed by the law firm of Patton Boggs LLP. I know Mr. Cox through our association as members of the same law firm, he in the Dallas, Texas office and I in the New York, New York office.

5. I have found Mr. Cox to be a skilled attorney, a person of integrity and high moral character. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Joseph M. Cox, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Joseph M. Cox, pro hac vice, which is attached hereto as Exhibit A.

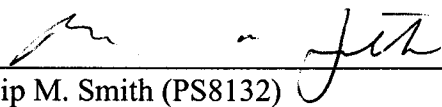
I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE it is respectfully requested that the motion to admit Joseph M. Cox pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: April 15, 2008

New York, New York

Respectfully submitted,

  
Philip M. Smith (PS8132)

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

April 10, 2008

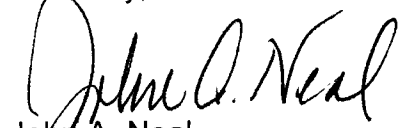
Re: Joseph M. Cox, State Bar Number 04950200

To Whom It May Concern:

This is to certify that Mr. Joseph M. Cox was licensed to practice law in Texas on November 2, 1990, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

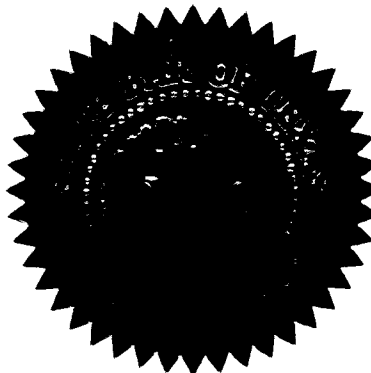
No previous disciplinary sanctions have been entered against Mr. Cox's law license.

Sincerely,



John A. Neal  
Chief Disciplinary Counsel

JN/ss



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JULIO & SONS COMPANY,

Plaintiff,

*-against-*

TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA,

Defendant.

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No. 2008 CIV. 03001 (RJH)

**ORDER FOR ADMISSION OF  
JOSEPH M. COX PRO HAC VICE  
ON WRITTEN MOTION**

Upon the Motion of Philip M. Smith, attorney for Defendant and said sponsor attorney's  
declaration in support;

IT IS HEREBY ORDERED that

Joseph M. Cox  
PATTON BOGGS LLP  
2001 Ross Avenue  
Suite 3000  
Dallas, Texas 75201  
Telephone: (214) 758-1500  
Facsimile: (214) 758-1550  
jcox@pattonboggs.com

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the  
United States District Court for the Southern District of New York. All attorneys appearing  
before this Court are subject to the Local Rules of this Court, including the Rules governing  
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,  
counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall  
forward the pro hac vice fee to the Clerk of Court.

DATED: April \_\_, 2008  
New York, New York:

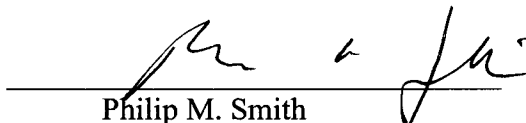
By: \_\_\_\_\_  
United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing **MOTION TO ADMIT JOSEPH M. COX PRO HAC VICE, DECLARATION OF PHILIP M. SMITH IN SUPPORT OF MOTION TO ADMIT JOSEPH M. COX PRO HAC VICE, and ORDER ON ADMISSION OF JOSEPH M. COX PRO HAC VICE ON WRITTEN MOTION** were served upon attorneys for the Defendants as follows via first class mail:

James Sandnes, Esq.  
Boundas, Skarzynski, Walsh & Black, LLC  
One Battery Park Plaza, 32<sup>nd</sup> Floor  
New York, NY 10004

Dated: April 15, 2008

  
Philip M. Smith